

Todd A. Noah (State Bar No. 152328)
Barbara L. Friedman (State Bar No. 208735)
DERGOSITS & NOAH LLP
One Embarcadero Center, Suite 350
San Francisco, CA 94111
Telephone: (415) 705-6377
Facsimile: (415) 750-6383
Email: tnoah@dergnoah.com
Email: bfriedman@dergnoah.com

Attorneys for Plaintiff

PRO-SHORE, LLC

Michelle Akerman (State Bar No. 265022)

Emily M. Charley (State Bar No. 238542)

HANSON BRIDGETT, LLP

WILKINSON, BRAIN & CO., LTD.
425 Market Street, 26th Floor

125 Market Street, 20th Fl.
San Francisco, CA 94105

San Francisco, CA 94105
Telephone: (415) 995-5172

Telephone: (415) 995-5172
Facsimile: (415) 995-3469

Email: makerman@hansonbridgett.com

Email: echarley@hansonbridgett.com

Attorneys for Plaintiffs

Attorneys for Plaintiffs
PRO-SHORE LLC, BUILD GROUP INC

**PRO-SHORE, LLC, BUILD GROUP
and PACIFIC STRUCTURES, INC.**

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

1 Plaintiffs Pro-Shore, LLC, Build Group, Inc. and Pacific Structures, Inc. and Defendant
2 Dayton Superior Corporation and (collectively, the “Parties”) hereby stipulate to continue all
3 upcoming deadlines currently set in this case for 30 days. These deadlines include: 1) the date for
4 plaintiff Pro-Shore, LLC to file a second amended complaint; 2) the date for the parties’ Joint Case
5 Management Statement; and 3) the March 29, 2018 Initial Case Management Conference.

6 The reason for the continuance is that on February 22, 2018, the parties conducted an in-
7 person settlement conference with the principals of each of the parties in attendance. During the
8 conference, the parties expressed a desire to resolve the outstanding disputes between them and
9 continue their business relationships with each other. To that end, the parties agreed to schedule
10 additional meetings to discuss specific topics in an effort to possibly reach a resolution. The parties
11 are optimistic that they will be able to resolve their disputes without further Court intervention and
12 the additional time will enable the parties to meet this goal. In the event the parties do not finalize a
13 settlement within 30 days from the date of the order, the parties will jointly notify the Court on the
14 30th day that they either need more time to complete the agreement or that no settlement agreement
15 has been reached.

16 Pursuant to the Court’s CMC Order, the parties, through their respective counsel, stipulate
17 that the all upcoming deadlines be continued for 30 days and that the March 29, 2018 Initial Case
18 Management Conference be continued to May 3, 2018 at 9:30 a.m., or the next available date on the
19 Court’s calendar.

20

21 **IT IS SO STIPULATED.**

22 Dated: February 26, 2018

23 By: /s/ Todd A. Noah
24 Todd A. Noah (SBN 152328)
tnoah@dergnoah.com
25 DERGOSITS & NOAH LLP
26 One Embarcadero Center, Suite 350
27 San Francisco, CA 94111
Telephone: (415) 705-6377
Facsimile: (415) 750-6383

28 Attorneys for Plaintiff
PRO-SHORE, LLC

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Emily M. Charley (State Bar No. 238542)
echarley@hansonbridgett.com
HANSON BRIDGETT, LLP
425 Market Street, 26th Floor
San Francisco, CA 94105
Telephone: (415) 995-5172
Facsimile: (415) 541-9366

Attorneys for Plaintiffs
PRO-SHORE, LLC, BUILD GROUP,
INC. AND PACIFIC STRUCTURES,
INC.

Dated: February 26, 2018

By: /s/ Sheryl Koval Garko
Lisa Greenwald-Swire (SBN 213269)
greenwald-swire@fr.com
Katherine D. Prescott (SBN 215496)
prescott@fr.com
FISH & RICHARDSON P.C.
500 Arguello Street, Suite 500
Redwood City, California 94063
Telephone: (650) 839-5070
Facsimile: (650) 839-5071

Sheryl Koval Garko (*appearing pro hac vice* /
garko@fr.com)
FISH & RICHARDSON P.C.
One Marina Park Drive
Boston, Massachusetts 02210-1878
Telephone: (617) 542-5070
Facsimile: (617) 542-8906

Vivian Cheng (*appearing pro hac vice* /
cheng@fr.com)
Fish & Richardson P.C.
601 Lexington Avenue
52nd Floor, New York, NY 10022
Telephone: (212) 765-5070
Facsimile: (212) 258-2291

Attorneys for Defendant,
DAYTON SUPERIOR CORPORATION

1 I attest under penalty of perjury that concurrence in the filing of this document has been
2 obtained from Sheryl Koval Garko.

3 /s/ Todd A. Noah

4
5 PURSUANT TO STIPULATION, IT IS SO ORDERED

6
7
8 Dated: ~~February~~ ^{3/5} _____, 2018

